

EXHIBIT QQ



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Philadelphia District Office

Attorney Referred Charge Checklist

Your Name (Charging Party's Attorney's Name): **Lisa Barbounis**

Your e-mail address (Charging Party's Attorney's e-mail): **seth@dereksmithlaw.com**

Your firm's name & address: **Derek Smith Law Group, PLLC 1835 Market Street, Suite 2950, Philadelphia PA 19103**

Date Submitted: **December 13, 2019**

Location of Alleged Discrimination: **Middle East Forum and other locations as described in the Charge**

Date(s) of Alleged Discrimination: **2017 until present**

EEOC Office Use Only

Date Received:

Statute/s: **Basis (protected class/es): sex and gender and sexual harassment and retaliation**
Issue (alleged discriminatory action/s): discrimination and harassment and retaliation

Charging Party
 Name: **Lisa Barbounis**
 E-mail address: **seth@dereksmithlaw.com**
 National Origin: **U.S.A.** Race: **Caucasian** Gender: **Female** DOB: **10/07/1981**

Respondent
 Name of Respondent: **Middle East Forum, Daniel Pipes, Greg Roman and Mathew Bennett**
 Name of Respondent official who should receive the Charge: **unknown**
 Address of Respondent official: **1650 Market Street, Suite 3600, Philadelphia PA 19103**
 E-mail address of Respondent official: **unknown**

Is this an Amended Charge: **No**

Yes

No

If yes, provide: Charge No.

Is this related to a previously filed Charge: **Yes - 4 charges filed against Middle East Forum today.**

Yes

No

If yes, provide: Charge No.

Have you previously filed this matter with EEOC or another agency: **No.**

Yes

No

If yes, provide name of agency & date of filing:

Prefer Mediation **Yes**

Yes

Need more info.

Requesting Immediate Issuance of Right to Sue **No**

Yes

No

**INFORMATION FOR COMPLAINANTS & ELECTION OPTION TO DUAL FILE WITH THE
PENNSYLVANIA HUMAN RELATIONS COMMISSION**

Case Name: Lira Barbounis v. Middle East Forum

EEOC Charge Number: _____

You have the right to dual file this EEOC charge of discrimination with the Pennsylvania Human Relations Commission (PHRC) under the Pennsylvania Human Relations Act. Filing your charge with PHRC protects your state rights, especially since there may be circumstances in which state and federal laws and procedures vary in a manner which could affect the outcome of your case.

Complaints filed with PHRC must be filed within 180 days of the act(s) which you believe are unlawful discrimination. If PHRC determines that your PHRC complaint is untimely, it will be dismissed.

If you also want your EEOC charge filed with PHRC, including this form as part of your EEOC charge, with your signature under the verification below, will constitute filing with PHRC. You have chosen EEOC to investigate your complaint, so PHRC will not conduct a separate investigation and, in most cases, will accept EEOC's findings. If you disagree with PHRC's adoption of EEOC's findings, you will have the chance to file a request for preliminary hearing with PHRC.

Since you have chosen to initially file your charge with EEOC, making it the primary investigatory agency, the Respondent will not be required to file an answer with PHRC, and no other action with PHRC is required by either party, unless/until otherwise notified by PHRC.

If your case is still pending with PHRC after one year from filing with PHRC, you have the right to file your complaint in State court. PHRC will inform you of these rights and obligations at that time.

SIGN AND DATE APPROPRIATE REQUEST BELOW

I want my charge dual filed with PHRC. I hereby incorporate this form and the verification below into the attached EEOC complaint form and file it as my PHRC complaint. I request that EEOC transmit a copy to PHRC.

I understand that false statements in this complaint are made subject to the penalties of 18 Pa. C.S. 4904, relating to unsworn falsification to authorities.

X Lira Barbounis
Signature and Date

OR

I do not want my charge dual filed with PHRC.

Signature and Date

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

AGENCY

CHARGE NUMBER

☐

FEPA

☒

EEOC

Dual file with Philadelphia Human Relations Commission and Pennsylvania Human Relations Commission and EEOC

State or local Agency, if any

NAME (Indicate Mr., Ms., Mrs.)

Lisa Barbounis

HOME TELEPHONE (Include Area Code)

215.910.2154

STREET ADDRESS CITY, STATE AND ZIP CODE

2601 Pennsylvania Avenue Philadelphia PA 19130

DATE OF BIRTH

10-7-1981

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

Middle East Forum

NUMBER OF EMPLOYEES, MEMBERS

25 plus

TELEPHONE (Include Area Code)

215.546.5406

STREET ADDRESS

1650 Market Street, Suite 3600 Philadelphia PA 19103

CITY, STATE AND ZIP CODE

COUNTY

Philadelphia

NAME

Greg Roman, Daniel Pipes, Matthew Bennett

TELEPHONE NUMBER (Include Area Code)

215.546.5406

STREET ADDRESS

1650 Market Street, Suite 3600 Philadelphia PA 19103

CITY, STATE AND ZIP CODE

COUNTY

Philadelphia

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☐

RACE

☐

COLOR

☒

SEX

☐

RELIGION

☐

NATIONAL ORIGIN

☒

RETALIATION

☐

AGE

☐

DISABILITY

☐

OTHER (Specify)

DATE DISCRIMINATION TOOK PLACE

October 2017 to Present

☒

CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

Charging Party, Lisa Barbounis was subjected to a severe and pervasive atmosphere of discrimination and harassment in the workplace. Charging Party now files this Charge of Discrimination against the above named Respondents, Middle East Forum, Greg Roman, Daniel Pipes, and Matthew Bennett. Charging Party was employed at the Middle East Forum from October 2017 until her unlawful termination by constructive discharge August 2019. Charging Party Lisa Barbounis notified Respondents that she could no longer tolerate working in such hostile work conditions and resigned her position at the Middle East Forum to avoid further discrimination and harassment and retaliation to which Charging Party was subjected by Respondents during her employment. Charging Party's resignation letter notified Respondents that she could no longer tolerate the severe and pervasive discrimination and harassment which caused Charging Party to suffer physical and mental distress. Charging Party reported the discrimination and harassment and was subjected to further retaliation. Charging Party hereby would ask the EEOC and Pennsylvania Human Relations Commission to consider her previously filed Charge of Discrimination which was assigned the Charge number 530-2019-04525. When this Charge was filed in June 2019, Charging Party had not yet been constructively discharged from her employment. After filing her Charge, Charging Party was subjected to further discrimination, harassment and retaliation. Charging Party attempted to continue her employment at the Middle East Forum however, Respondents initiated a campaign of retaliation against Charging Party pursuant to Charging Party's reports of discrimination and harassment and her attempts to vindicate her rights by filing a Charge of Discrimination, previous Charge number identified above. Charging Party was subjected to tangible employment actions. Charging Party's position with the Middle East Forum was changed and altered. Charging Party's ability to do the work that she was responsible for changed at Respondents subjected Charging Party to further discrimination and harassment and retaliation by reassigning Charging Party or subjecting Charging Party to discipline. Charging Party was threatened. Charging Party was ignored. The entire office Changed after Charging Party filed her Charge and it was communicated to Charging Party without any ambiguity that Charging Party was no longer welcome at the Middle East Forum. Charging Party was made to understand that she was not welcome at the Middle East Forum and that Charging Party's future at the Middle East Forum would afford Charging Party no opportunity for advancement and indeed Charging Party would not even be permitted to perform the same responsibilities that she performed prior to Charging Party submitting a Charge of Discrimination at the EEOC and PHRC. Respondents disparate treatment and retaliation against Charging Party and the hostile work environment that began October 2017 culminated in a tangible employment action: Charging Party's termination.

I want this charge filed with both the EEOC and the State or local Agency, if any I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY (When necessary for State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Day, month, and year)

Date 12/10/19 Charging Party (Signature)

10-Dec-2019

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA

☒ EEOC

Pennsylvania Human Relations Commission and Philadelphia Commission on Human Relations and EEOC

State or local Agency, if any

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

Charging Party Lisa Barbounis also adds additional retaliation which Respondents have undertaken in their campaign of retaliation to which Respondents have subjected Charging Party due to Charging Party's reports of and opposition to Respondents discrimination and harassment in the workplace. Respondents and Respondent, Middle East Forum has filed a Civil Action Complaint against Charging Party, Lisa Barbounis. Respondents have accused Charging Party of violations of Breach of Contract – Confidentiality & Non-Disclosure Agreement (Count I), Breach of Contract – Bring Your Own Device Agreement (Count II), Computer Fraud and Abuse Act (Count III), Pennsylvania Uniform Trade Secrets Act (Count IV), Defend Trade Secrets Act (Count V), Stored Communications Act (Count VI), Conversion of Confidential Information (Count VII), Breach of Fiduciary Duty (Count VIII), and Declaratory Judgment (Count IX). Defendants attempt to litigate these frivolous claims is nothing more than retaliation. This purely frivolous suit is Respondents attempt to harass, embarrass, disparage, and discredit Charging Party related to Charging Party's protected activity. Charging Party has filed a lawful Charge of discrimination and harassment and upon receipt of her Right to Sue letter from the EEOC, Charging Party filed a Civil Action lawsuit against Respondents. Respondents have answered Charging Party's lawful Charging and Civil Action Complaint with the above referenced frivolous Complaint. Respondents have forced Charging Party to retain counsel, spent time and money to defend this frivolous suit. Respondents have also caused Charging Party to suffer further emotional distress.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

NOTARY – When necessary for State and Local Agency Requirements
KENDRA NICHOLAS
 NOTARY PUBLIC DISTRICT OF COLUMBIA
 My Commission Expires November 30, 2022

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
 (month, day, year)

12-10-2019

Date

Charging Party Signature



June 20, 2019

Via Email: "EEOC Philadelphia" <philatty@eeoc.gov>

Equal Employment Opportunity Commission

801 Market Street

Suite 1300

Philadelphia, PA 19107-3127

Attention: Intake Unit

Re: Our Client : Lisa Barbounis
 Nature of Complaint : Discrimination, Harassment & Retaliation

-against-

Middle East Forum

Daniel Pipes

Greg Roman

Matthew Bennett

(collectively "Respondents").

Dear Sir or Madam:

The following Charge of discrimination and retaliation is filed on behalf of our client, Lisa Barbounis against the Middle East Forum, Daniel Pipes, Greg Roman, and Matthew Bennett, (hereinafter "Respondents").

We request this Charge be dual filed with the Pennsylvania Human Relations Commission, the Philadelphia Commission on Human Relations and any other state or local agency with whom the EEOC has a work sharing agreement. Charging Party, Lisa Barbounis makes her claim under all applicable rules, regulations, statutes and ordinances relevant to the facts provided.

New York City Office: One Penn Plaza, Suite 4905, New York, NY 10119 | (212) 587-0760
Philadelphia Office: 1835 Market Street, Suite 2950, Philadelphia, PA 19103 | (215) 391-4790
Miami Office: 100 SE 2nd Street, Suite 2000, Miami, FL 33131 | (305) 946-1884
New Jersey Office: 73 Forest Lake Drive, West Milford, NJ 07421 | (973) 388-8625
Website: www.discriminationandsexualharassmentlawyers.com

LB EEOC Docs 0006

Upon information and belief Charging Party, Lisa Barbounis avers the following:

PARTIES

1. Charging Party, Lisa Barbounis (“Charging Party”) is an adult individual who resides in the Commonwealth of Pennsylvania with an address for purposes of correspondence at 3601 Pennsylvania Avenue, Suite 1153, Philadelphia, Pennsylvania 19130.
2. Respondent, Middle East Forum is a non-profit organization which is licensed to and regularly transacts business in the Commonwealth of Pennsylvania with offices for the purposes of correspondence at 1650 Market Street, Suite 3600, Philadelphia, Pennsylvania 19103.
3. Respondent, Daniel Pipes is an adult individual who resides in the Commonwealth of Pennsylvania with a business address for the purposes of correspondence at 1650 Market Street, Suite 3600, Philadelphia, Pennsylvania 19103.
4. At all times relevant to this Charge, Respondent, Daniel Pipes was employed by Respondents, held the title President, and held supervisory authority over Charging Party, Lisa Barbounis.
5. Respondent, Greg Roman is an adult individual who resides in the Commonwealth of Pennsylvania with a business address for the purposes of correspondence at 1650 Market Street, Suite 3600, Philadelphia, Pennsylvania 19103.
6. At all times relevant to this Charge, Respondent, Greg Roman was employed by Respondents as the Director of the Middle East Forum and held supervisory authority over Charging Party, Lisa Barbounis.

7. Respondent, Matthew Bennett is an adult individual who resides in the Commonwealth of Pennsylvania with a business address for the purposes of correspondence at 1650 Market Street, Suite 3600, Philadelphia, Pennsylvania 19103.
8. At all times relevant to this Charge, Respondent, Matthew Bennett was employed by Respondents and held supervisory authority over Charging Party, Lisa Barbounis.
9. At all times relevant to this Charge Respondents were Charging Party's joint and sole employer.

MATERIAL FACTS

10. Charging Party, Lisa Barbounis ("Charging Party") began her employment for Respondents, Middle East Forum, Daniel Pipes, Greg Roman, and Mathew Bennett (collectively "Respondents") sometime around October 23, 2017.
11. Charging Party was hired as an Executive Liesan.
12. Respondent, Greg Roman is currently the Director of the Middle East Forum.
13. Respondent, Daniel Pipes is currently the President of the Middle East Forum.
14. March 2018, Charging Party, Lisa Barbounis and coworker, Patricia McNulty attended a conference in Washington DC. This conference was the American Israel Public Affairs Committee ("APAC").
15. Others in attendance included Respondent, Greg Roman, Respondent, Mathew Bennett, and coworker, Marnie Meyer.
16. Respondent, Greg Roman and Respondent, Mathew Bennett booked an Airbnb in Washington D.C. for the APAC Conference.
17. Charging Party, Lisa Barbounis booked a hotel room for the APAC Conference.

18. The other female employees, including coworker, Patricia McNulty also booked hotel rooms for the APAC Conference.
19. After dinner, Respondent, Greg Roman invited Grantees from The Pinsky Center and a writing fellow named Raheem Kassam back to his Airbnb.
20. Respondent, Greg Roman sat on the couch between Charging Party, Lisa Barbounis and coworker, Patricia McNulty.
21. Respondent, Greg Roman proceeded to put his arms around both Charging Party, Lisa Barbounis and coworker, Patricia McNulty.
22. Respondent, Greg Roman grabbed coworker, Patricia McNulty by her upper thigh and violently yanked coworker, Patricia McNulty onto his lap. Respondent, Greg Roman then began whispering inappropriate sexual advances in coworker, Patricia McNulty's ear.
23. Charging Party, Lisa Barbounis was present and witnesses this violent and aggressive sexual assault.
24. Coworker, Patricia McNulty tried to pull away from Respondent, Greg Roman who resisted coworker, Patricia McNulty attempts to escape from Respondent, Greg Roman's grip.
25. Coworker, Patricia McNulty had to fight to get away.
26. Once coworker, Patricia McNulty was able to get away, she left the room and entered the kitchen area. Thereafter, Charging Party, witnesses Respondent, Greg Roman leave the room and go upstairs. He did not return downstairs.
27. Respondent, Greg Roman sexually assaulted coworker, Patricia McNulty at the APAC conference when he violently yanked her across the couch, onto his lap, and whispered inappropriate, unwelcome sexual advances in her ear.

28. Respondent, Greg Roman subjected Charging Party, Lisa Barbounis to severe and pervasive discrimination and harassment based upon Charging Party's sex and gender.
29. Respondent, Greg Roman screamed at Charging Party. Respondent, Greg Roman cursed at Charging Party. Respondent, Greg Roman did not treat Charging Party's similarly situated male coworkers in this discriminatory, abusive, hostile and intolerable manner.
30. Respondent, Greg Roman also subjected Charging Party's coworker, Patricia McNulty to severe and pervasive discrimination and harassment based upon her sex and gender.
31. Respondent, Greg Roman also subjected Charging Party's coworker, Caitriona Brady to severe and pervasive discrimination and harassment based upon her sex and gender.
32. Respondent, Greg Roman also subjected Charging Party's coworker, Delaney Yonchek to severe and pervasive discrimination and harassment based upon her sex and gender.
33. In April 2018, Respondent, Greg Roman and Charging Party, Lisa Barbounis were sent to Israel for business meetings. This was a work trip organized through and for the Middle East Forum.
34. Respondent, Greg Roman ordered Charging Party, Lisa Barbounis not to tell anyone that Charging Party, Lisa Barbounis was accompanying Respondent, Greg Roman on the trip.
35. Respondent, Greg Roman notified Charging Party, Lisa Barbounis that in order to travel to Israel, Charging Party had to agree to share an Airbnb with him. Charging Party, Lisa Barbounis agreed on the condition that they book a two-bedroom Airbnb. This was a specific condition because Respondent, Greg Roman refused to take Charging Party Lisa Barbounis on the Israel trip unless she agreed to share an Airbnb with him. Charging Party, Lisa Barbounis wanted the opportunity to travel to Israel and therefore made certain that Respondent, Greg Roman booked a two-bedroom Airbnb.

36. Respondent, Greg Roman subjected Charging Party, Lisa Barbounis to *quid pro quo* sexual harassment by forcing her to share an Airbnb with him in order to travel to Israel.
37. Respondent, Greg Roman asked Marnie Meyer to go on the trip before he asked Charging Party, Lisa Barbounis. When Marnie Meyer informed Respondent, Greg Roman that she wanted to have her own hotel room, Respondent, Greg Roman said, “just forget it.”
38. Before the Israel trip, Respondent, Greg Roman instructed Charging Party, Lisa Barbounis not to tell anyone that she was coming on the trip. Respondent, Greg Roman said, “Don’t tell your family. Don’t tell Daniel. Don’t tell anyone in the office.”
39. While on the trip, Charging Party, Lisa Barbounis was sitting on the couch in the living room/entertainment room of the Airbnb when Respondent, Greg Roman sat down next to Charging Party Lisa Barbounis. Respondent, Greg Roman then put his legs on the couch and put his feet under Charging Party Lisa Barbounis’s backside.
40. Respondent, Greg Roman then said: “now that my foot is on your ass we have reached a new level.” Charging Party Lisa Barbounis got up, walked away and tried to laugh it off. Charging Party Lisa Barbounis was highly uncomfortable at the obvious, inappropriate and unwelcome sexual advance.
41. The next evening, Respondent, Greg Roman left the Airbnb to go out. Charging Party Lisa Barbounis stayed home to work and finish a Power Point.
42. Respondent, Greg Roman arrived home and confessed to Charging Party Lisa Barbounis that he had a sexual relationship with a current intern in the Israel office for the Middle East Forum named, Leah Merville.
43. Respondent, Greg Roman secured Leah Merville’s internship in Israel. Respondent, Greg Roman secured Leah Merville’s internship in Israel based upon a *quid pro quo* sexual

harassment. Respondent, Greg Roman informed Charging Party Lisa Barbounis that when Leah Merville visited Respondent Greg Roman's hotel room to sign the internship papers, "that's when I fucked her."

44. Respondent, Greg Roman continued to describe the sexual harassment to Charging Party Lisa Barbounis. Respondent, Greg Roman said that Leah Merville gives a really great blowjob. Respondent, Greg Roman said, "her body is so tight." Respondent, Greg Roman continued to describe in detail his sexual relationship to Charging Party Lisa Barbounis.
45. Charging Party Lisa Barbounis was highly offended and scared to be alone with Respondent, Greg Roman. Charging Party Lisa Barbounis sent text messages while she was on the Israel trip to coworker, Patricia McNulty and stated that she was scared and planned to sleep with a knife under her pillow. These text messages are available should the EEOC investigator wish to view them.
46. Respondent, Greg Roman informed Charging Party Lisa Barbounis that he attempted to make contact with Leah Merville that night. Respondent, Greg Roman explained that he desired to continue the sexual relationship with the intern, Leah Merville. However, Respondent, Greg Roman said that Leah Merville was ignoring his calls.
47. Respondent, Greg Roman then directed his sexual advances toward Charging Party Lisa Barbounis. Respondent, Greg Roman informed Lisa Barbounis, "I just need a sexual release." Respondent, Greg Roman informed Charging Party Lisa Barbounis, "I really need a blowjob."
48. The entire time that Respondent, Greg Roman spoke to Charging Party Lisa Barbounis, he aggressively paced the room and said, I just need a blow job. I just need a release.

49. Charging Party Lisa Barbounis was scared, offended, harassed, modified, and creeped out.
50. Respondent, Greg Roman's aggressive sexual conduct became more aggressive.
Respondent, Greg Roman's voice got louder as he continued to visit his sexual advances upon Charging Party Lisa Barbounis.
51. Respondent, Greg Roman was Charging Party Lisa Barbounis's direct supervisor.
52. Respondent, Greg Roman employed policies, procedures and protocols designed to create a barrier between Charging Party Lisa Barbounis and President Daniel Pipes. This barrier was aimed at limiting the opportunities that Charging Party had to report Respondent, Greg Roman's unwelcome sexual conduct and comments.
53. Pursuant to the sexual advances described above and the assault on coworker, Patricia McNulty, Respondent, Greg Roman began subjecting Charging Party Lisa Barbounis to discrimination and harassment in the office based upon Charging Party's sex and gender.
54. This discrimination and harassment escalated significantly after the Israel trip and after Charging Party, Lisa Barbounis rejected Respondent's Greg Roman's unwelcome sexual advances.
55. Respondent, Greg Roman followed Charging Party Lisa Barbounis around the office.
Respondent, Greg Roman entered Charging Party Lisa Barbounis' office when she was not present and explored her computer including personal emails, chat history, and internet browser history. Respondent, Greg Roman also asked other employees to spy on Charging Party Lisa Barbounis.
56. Respondent, Greg Roman kept tabs on the number of times that Charging Party used the bathroom.

57. Respondent, Greg Roman subjected Charging Party to severe and pervasive discrimination and harassment based upon her sex and gender. This discrimination and harassment was evident in the way that Respondent, Greg Roman spoke to Charging Party, the assignments he provided, his tone of voice, body language, expressions, cursing, and other threatening conduct. Respondent, Greg Roman created a hostile work environment for Charging Party.
58. Charging Party reported the discrimination and harassment to which she was subjected by Respondent, Greg Roman. Charging Party, Lisa Barbounis notified Marnie Meyer. Marnie Meyer prepared a handwritten letter addressed to Daniel Pipes and provided same on November 1, 2018.
59. Respondent, Daniel Pipes spoke to Charging Party the same day and Charging Party reported the discrimination and harassment and sexual harassment that occurred on the Israel trip. Charging Party also notified Respondent, Daniel Pipes about the Respondent, Greg Roman's sexual harassment during the APAC Conference.
60. Charging Party also described to Respondent, Daniel Pipes the way that Respondent, Greg Roman's behavior changed significantly after Charging Party rejected his unwelcome sexual advances.
61. In addition to the reports of discrimination and harassment which Charging Party provided, several other employees at the Middle East Forum also spoke to Respondent, Daniel Pipes on November 1, 2018.
62. By at least November 1, 2018, Respondent Daniel Pipes was on notice regarding Respondent, Greg Roman's discrimination and harassment to which he subjected the female staff employed by the Middle East Forum. This included the incident at the

APAC Conference when Respondent, Greg Roman sexually assaulted Patricia McNulty.

This also included the incident in Israel when Respondent, Greg Roman subjected

Charging Party, Lisa Barbounis to unwelcome lewd sexual advances.

63. After Respondent, Daniel Pipes learned about the ongoing severe and pervasive discrimination and harassment, he notified Charging Lisa Barbounis, Marnie Meyer, Patricia McNulty, and Respondent, Mathew Bennett that nothing was going to be done to ameliorate the discrimination and harassment. Respondent, Daniel Pipes said, “priests have been accused of more and not lost their jobs.”
64. Accordingly, Respondent, Daniel Pipes notified the office that the standard at the Middle East Forum for discipline pursuant to anti-discrimination laws was not reached by Respondent, Greg Romans’ severe and pervasive conduct and comments. This includes the sexual assault of Patricia McNulty and the sexual advances and propositions of Charging Party, Lisa Barbounis.
65. Accordingly Respondent, Daniel Pipes initiated no discipline and no corrective action was taken.
66. Charging Party Lisa Barbounis, Marnie Meyer, Patricia McNulty, and Respondent, Mathew Bennett were instructed to work from home the following Friday.
67. Respondent, Daniel Pipes also instructed Charging Party Lisa Barbounis, Marnie Meyer, Patricia McNulty, and Respondent, Mathew Bennett to execute new Nondisclosure Agreements. Charging Party and Lisa Barbounis refused to sign.
68. Saturday, November 3, 2018, Charging Party Lisa Barbounis received an email from Respondent, Daniel Pipes instructing Charging Party to attend a group meeting scheduled Monday, November 5, 2018. This memorandum was sent as a group email to Charging

Party and her coworkers. Respondent, Greg Roman was included in the email and invitation to attend the group meeting.

69. In fact, Respondent, Greg Roman was specifically asked to attend the group meeting. It was not until Monday, November 5, 2018 when a call was made to Respondent, Greg Roman asking that he stay home.
70. Notwithstanding, Respondent, Greg Roman's sister attended the meeting and spent the entire meeting suggesting that the woman who Respondent, Greg Roman sexually harassed were at fault for wearing short skirts. This meeting is indicative of Respondent, Daniel Pipes utter failure to bring his organization into compliance with state and federal anti-discrimination laws.
71. After the November 5, 2018 meeting, Respondent, Daniel Pipes decided that Respondent, Greg Roman would retain his position, title, pay, and employment with the Middle East Forum.
72. Respondent, Daniel Pipes notified Charging Party that Respondent, Greg Roman would work from home and that Charging Party would no longer directly report to Respondent Greg Roman. However, this is not what occurred
73. For the next four to five months, Charging Party was forced to continue working with Respondent, Greg Roman. The only change was that Respondent, Greg Roman did not visit the office anymore. Charging Party was still subjected to working directly with Respondent, Greg Roman
74. Charging Party was still subjected to the same discrimination and harassment when she was forced to work with Respondent, Greg Roman.

75. Moreover, Respondent, Greg Roman initiated a campaign of retaliation targeting the employees who Respondent, Greg Roman called “the usurpers.” Respondent Greg Roman also called them the “backstabbers.”
76. Respondent, Greg Roman notified Respondent, Mathew Bennett, “they are all usurpers and I will never work with usurpers.” Even more recently, Respondent, Greg Roman announced on a radio show that “all usurpers should be crushed.”
77. Charging Party was therefore forced to continue working with and taking orders from Respondent, Greg Roman.
78. Respondent, Greg Roman began a campaign of retaliation aimed at Charging Party and the other female employees in the office who reported discrimination and harassment including Marnie Meyer and Patricia McNulty.
79. Sometime around March 2019, Respondent, Daniel Pipes ordered Marnie Meyer, Patricia McNulty and Charging Party, Lisa Barbounis into a meeting where Respondent, Daniel Pipes announced that Respondent, Greg Roman was moving back to a position where he would begin working directly with Charging Party Lisa Barbounis and the other female employees Respondent, Greg Roman subjected to discrimination and harassment.
80. At all times Respondent, Greg Roman retained the position of Director of the Middle East Forum.
81. At all times, Charging Party was forced to continue working at the Middle East Forum with Respondent, Greg Roman.
82. In the March 2019 meeting, Respondent, Daniel Pipes announced that he was going to eliminate the purported safe measures initiated to protect the female staff from

Respondent, Greg Roman's severe and pervasive discrimination, harassment, and retaliation.

83. Accordingly, since March 2019, Respondent, Greg Roman's contact with the female staff including Charging Party has continued to increase.
84. Respondent, Greg Roman's campaign of retaliation since March 2019 has been aimed at effecting Charging Party's termination from the Middle East Forum.
85. This was also around the time when Charging Party and coworker Patricia McNulty learned about another allegation of sexual harassment involving Respondent, Greg Roman.
86. Respondent, Greg Roman began a rumor that Marnie Meyer was having a sexual relationship with Caitriona Brady's father.
87. Caitriona Brady is an employee at the Middle East Forum who holds the position Development Associate.
88. When Respondent, Greg Roman first learned that another allegation of sexual harassment was reported, he did not yet know the details of the allegation. Accordingly, Respondent, Greg Roman and Respondent, Mathew Bennett began a guessing game where they attempted to guess what the allegation involved. Respondent, Greg Roman incorrectly guessed that the sexual harassment allegation involved a former intern named Gabrielle Bloom who Respondent, Greg Roman paid to have sex with.
89. Accordingly, Respondent, Greg Roman subjected two female interns to *quid pro quo* sexual harassment, as well as subjecting Charging Party to a sexual assault.
90. Respondent, Greg Roman also subjected Charging Party, Lisa Barbounis to *quid pro quo* sexual harassment by forcing her to share an Airbnb with him in Israel.

91. Just days after the March 2019 meeting when Respondent, Daniel Pipes announced that he was eliminating the measures designed to protect female staff from Respondent Greg Roman, Respondent, Greg Roman called Respondent, Mathew Bennett. Respondent, Greg Roman informed Respondent, Matthew Bennett, “now that I am back, I am going to begin searching for a replacement for the Director of Development.”
92. This was the position of a coworker, Patricia McNulty who also reported discrimination and harassment by Respondent, Greg Roman.
93. Respondent, Greg Roman’s statement about Patricia McNulty indicated his intent to retaliate against the employees who reported discrimination and harassment. Respondent, Greg Roman’s primary targets were Patricia McNulty and Charging Party, Lisa Barbounis.
94. Respondent, Greg Roman has initiated a campaign of discrimination, harassment, and retaliation against Charging Party in an effort to effect Charging Party’s termination.
95. Charging Party has reported this to Respondent, Daniel Pipes. Respondent, Daniel Pipes has utterly disregarded all of Charging Party’s reports of ongoing discrimination, harassment and retaliation. If anything, Respondent, Daniel Pipes has continued to give Respondent, Greg Roman more access, authority, and opportunity to effectuate his discriminatory and retaliatory agenda.
96. At present, Charging Party is subjected to a severe and pervasive atmosphere of discrimination and harassment based upon her sex and gender and in retaliation for Charging Party’s reports and opposition to Respondents sexual harassment and discrimination and harassment of Charging Party.

97. Charging Party continues her attempts to report and obtain assistance from Respondent, Daniel Pipes.
98. Respondent, Daniel Pipes continues to protect, shield, indemnify and assist Respondent, Greg Roman from any and all impact caused by his severe and pervasive discrimination and harassment.
99. Accordingly, Respondent, Daniel Pipes has condoned, sanctioned, permitted, and allowed the discrimination, harassment, and retaliation to continue.
100. Respondents have made Charging Party's working conditions so onerous, abusive, and intolerable that no person in Charging Party's shoes should be expected to continue working under such conditions.
101. As a result of Respondents' actions, Charging Party felt extremely humiliated, degraded, victimized, embarrassed and emotionally distressed.
102. As a result of Respondents' conduct, Charging Party was caused to sustain serious and permanent personal injuries, including permanent psychological injuries. As a result of Respondents' actions, Charging Party felt extremely humiliated, degraded, victimized, embarrassed and emotionally distressed.
103. As a result of the acts and conduct complained of herein, Charging Party has suffered and will continue to suffer a loss of income, loss of salary, bonuses, benefits and other compensation to which such employment entailed.
104. Charging Party also suffered future pecuniary losses, emotional pain, humiliation, suffering, inconvenience, loss of enjoyment of life, and other non-pecuniary losses. Charging Party has further experienced severe emotional and physical distress.

105. As Respondents' conduct has been malicious, willful, outrageous, and conducted with full knowledge of the law, Charging Party demands Punitive Damages as against all the Respondents, jointly and severally.
106. Respondents have exhibited a pattern and practice of not only discrimination but also retaliation. At all times material Respondents refused to investigate or take appropriate remedial action in response to Charging Party's complaints of discrimination, harassment and hostile work environment.
107. Respondents discriminatory conduct was severe and pervasive, and created a hostile work environment for Charging Party.
108. The above are just some examples of some of the discrimination and retaliation to which Respondents subjected Charging Party.
109. Charging Party claims a pattern and practice of discrimination, claims continuing violations, and makes all claims herein under the continuing violations doctrine. Respondents have exhibited a pattern and practice of not only discrimination but also retaliation.

Please contact me if you have any questions or require any additional information. Thank you for your courtesy and cooperation in the matter.

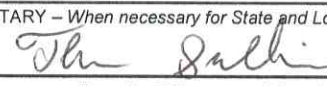

Very truly yours,

DEREK SMITH LAW GROUP, PLLC

BY: /s/ Seth D. Carson
Seth D. Carson, Esquire
1835 Market Street
Suite 2950
Philadelphia, PA 19103

DATED: June 20, 2019

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To: _____ Agency(ies) Charge No(s): _____	
		<input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	
Pennsylvania Human Relations Commission / Philadelphia Commission on Human Relations and EEOC <small>State or local Agency, if any</small>			
Name (indicate Mr., Ms., Mrs.) Lisa Barbounis		Home Phone (Incl. Area Code) 215-910-2154	Date of Birth 10/7/1981
Street Address 2601 Pennsylvania Avenue Philadelphia PA 19130		City, State and ZIP Code	
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name Middle East Forum		No. Employees, Members 25-Plus	Phone No. (Include Area Code) 215-546-5406
Street Address 1650 Market Street, Suite 3600 Philadelphia PA 19103		City, State and ZIP Code	
Name Gregg Roman & Daniel Pipes		No. Employees, Members	Phone No. (Include Area Code)
Street Address 1650 Market Street, Suite 3600 Philadelphia PA 19103		City, State and ZIP Code	
DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input checked="" type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest _____ Latest _____ October 16, 2017 - Present <input checked="" type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): <p>To be dual filed with the Philadelphia Commission on Human Relations and the Pennsylvania Human Relations Act. Charging Party, Lisa Barbounis submits this Charge of Discrimination against Respondents. Charging Party has prepared a separate Charge form of which this is the cover page.</p> <p>Charging Party was subjected to discrimination, harassment and retaliation based upon her sex and gender. The discrimination and harassment was severe and pervasive and created a hostile work environment.</p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements 	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	
Date 6-7-2019		SIGNATURE OF COMPLAINANT 	
Charging Party Signature		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year) 6/7/19	

Commonwealth of Pennsylvania - Notary Seal
 THOMAS SULLIVAN, Notary Public
 Philadelphia County
 My Commission Expires March 11, 2023

LB EEOC Docs 0023

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA☒ EEOC

_____ and EEOC

_____ State or local Agency, if any

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

6-7-2019 *Lea Bachauer*
 Date Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

Thomas Sullivan

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

Lea Bachauer

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
 (month, day, year)

6/7/19

Commonwealth of Pennsylvania - Notary Seal
 THOMAS SULLIVAN, Notary Public
 Philadelphia County
 My Commission Expires March 11, 2023
 Commission Number 1347443

LB EEOC Docs 0024

**INFORMATION FOR COMPLAINANTS & ELECTION OPTION TO DUAL FILE WITH THE
PENNSYLVANIA HUMAN RELATIONS COMMISSION**

Case Name: Lire Barbounis v. Middle East Forum

EEOC Charge Number: _____

You have the right to dual file this EEOC charge of discrimination with the Pennsylvania Human Relations Commission (PHRC) under the Pennsylvania Human Relations Act. Filing your charge with PHRC protects your state rights, especially since there may be circumstances in which state and federal laws and procedures vary in a manner which could affect the outcome of your case.

Complaints filed with PHRC must be filed within 180 days of the act(s) which you believe are unlawful discrimination. If PHRC determines that your PHRC complaint is untimely, it will be dismissed.

If you also want your EEOC charge filed with PHRC, including this form as part of your EEOC charge, with your signature under the verification below, will constitute filing with PHRC. You have chosen EEOC to investigate your complaint, so PHRC will not conduct a separate investigation and, in most cases, will accept EEOC's findings. If you disagree with PHRC's adoption of EEOC's findings, you will have the chance to file a request for preliminary hearing with PHRC.

Since you have chosen to initially file your charge with EEOC, making it the primary investigatory agency, the Respondent will not be required to file an answer with PHRC, and no other action with PHRC is required by either party, unless/until otherwise notified by PHRC.

If your case is still pending with PHRC after one year from filing with PHRC, you have the right to file your complaint in State court. PHRC will inform you of these rights and obligations at that time.

SIGN AND DATE APPROPRIATE REQUEST BELOW

I want my charge dual filed with PHRC. I hereby incorporate this form and the verification below into the attached EEOC complaint form and file it as my PHRC complaint. I request that EEOC transmit a copy to PHRC.

I understand that false statements in this complaint are made subject to the penalties of 18 Pa. C.S. 4904, relating to unsworn falsification to authorities.

X Lire Barbounis
Signature and Date

OR

I do not want my charge dual filed with PHRC.

Signature and Date

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: Lisa Barbounis
2601 Pennsylvania Avenue
Philadelphia, PA 19130

From: Philadelphia District Office
801 Market Street
Suite 1300
Philadelphia, PA 19107

☐

On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

530-2019-04525

Legal Unit,
Legal Technician

(215) 440-2828

(See also the additional information enclosed with this form.)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA): This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA **must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

☐

More than 180 days have passed since the filing of this charge.

☒

Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.

☒

The EEOC is terminating its processing of this charge.

☐

The EEOC will continue to process this charge.

Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, **the paragraph marked below applies to your case:**

☐

The EEOC is closing your case. Therefore, your lawsuit under the ADEA **must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice**. Otherwise, your right to sue based on the above-numbered charge will be lost.

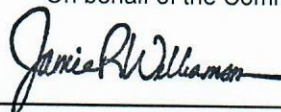
☐

The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission



Jamie R. Williamson,
District Director

7/31/19

(Date Mailed)

Enclosures(s)

cc:

Daniel Pipes (President)
MIDDLE EAST FORUM
1650 Market Street, Suite 3600
Philadelphia, PA 19103

Seth D. Carson, Esq.
DEREK SMITH LAW GROUP
1835 Walnut Street, Suite 2950
Philadelphia, PA 19103

**INFORMATION RELATED TO FILING SUIT
UNDER THE LAWS ENFORCED BY THE EEOC**

*(This information relates to filing suit in Federal or State court under Federal law.
If you also plan to sue claiming violations of State law, please be aware that time limits and other
provisions of State law may be shorter or more limited than those described below.)*

**PRIVATE SUIT RIGHTS -- Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA),
the Genetic Information Nondiscrimination Act (GINA), or the Age
Discrimination in Employment Act (ADEA):**

In order to pursue this matter further, you must file a lawsuit against the respondent(s) named in the charge **within 90 days of the date you receive this Notice**. Therefore, you should **keep a record of this date**. Once this 90-day period is over, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and its envelope, and tell him or her the date you received it. Furthermore, in order to avoid any question that you did not act in a timely manner, it is prudent that your suit be filed **within 90 days of the date this Notice was mailed to you** (as indicated where the Notice is signed) or the date of the postmark, if later.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. (Usually, the appropriate State court is the general civil trial court.) Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. Filing this Notice is not enough. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Courts often require that a copy of your charge must be attached to the complaint you file in court. If so, you should remove your birth date from the charge. Some courts will not accept your complaint where the charge includes a date of birth. Your suit may include any matter alleged in the charge or, to the extent permitted by court decisions, matters like or related to the matters alleged in the charge. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office. If you have simple questions, you usually can get answers from the office of the clerk of the court where you are bringing suit, but do not expect that office to write your complaint or make legal strategy decisions for you.

PRIVATE SUIT RIGHTS -- Equal Pay Act (EPA):

EPA suits must be filed in court within 2 years (3 years for willful violations) of the alleged EPA underpayment: back pay due for violations that occurred **more than 2 years (3 years) before you file suit** may not be collectible. For example, if you were underpaid under the EPA for work performed from 7/1/08 to 12/1/08, you should file suit **before 7/1/10** -- not 12/1/10 -- in order to recover unpaid wages due for July 2008. This time limit for filing an EPA suit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, suit must be filed within 90 days of this Notice and within the 2- or 3-year EPA back pay recovery period.

ATTORNEY REPRESENTATION -- Title VII, the ADA or GINA:

If you cannot afford or have been unable to obtain a lawyer to represent you, the U.S. District Court having jurisdiction in your case may, in limited circumstances, assist you in obtaining a lawyer. Requests for such assistance must be made to the U.S. District Court in the form and manner it requires (you should be prepared to explain in detail your efforts to retain an attorney). Requests should be made well before the end of the 90-day period mentioned above, because such requests do not relieve you of the requirement to bring suit within 90 days.

ATTORNEY REFERRAL AND EEOC ASSISTANCE -- All Statutes:

You may contact the EEOC representative shown on your Notice if you need help in finding a lawyer or if you have any questions about your legal rights, including advice on which U.S. District Court can hear your case. If you need to inspect or obtain a copy of information in EEOC's file on the charge, please request it promptly in writing and provide your charge number (as shown on your Notice). While EEOC destroys charge files after a certain time, all charge files are kept for at least 6 months after our last action on the case. Therefore, if you file suit and want to review the charge file, **please make your review request within 6 months of this Notice**. (Before filing suit, any request should be made within the next 90 days.)

IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Lisa Barbounis**
2601 Pennsylvania Avenue
Philadelphia, PA 19130

From: **Philadelphia District Office**
801 Market Street
Suite 1300
Philadelphia, PA 19107



On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

530-2020-01489

Legal Unit,
Legal Technician

(267) 589-9700

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

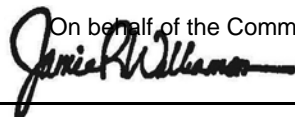
No Jurisdiction - Lawsuit filed, Docket No. 2:19-cv-05030-JDW

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission


Jamie R. Williamson,
District Director

March 20, 2020

(Date Mailed)

Enclosures(s)

cc: **MIDDLE EAST FORUM**
David J. Walton, Esq. (for Respondent)
COZEN O'CONNOR
1650 Market Street, Suite 2800
Philadelphia, PA 19103

Seth Carson, Esq. (for Charging Party)
DEREK SMITH LAW GROUP, PLLC
1835 Market Street, Suite 2950
Philadelphia, PA 19103

**INFORMATION RELATED TO FILING SUIT
UNDER THE LAWS ENFORCED BY THE EEOC**

*(This information relates to filing suit in Federal or State court under Federal law.
If you also plan to sue claiming violations of State law, please be aware that time limits and other
provisions of State law may be shorter or more limited than those described below.)*

**PRIVATE SUIT RIGHTS -- Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA),
the Genetic Information Nondiscrimination Act (GINA), or the Age
Discrimination in Employment Act (ADEA):**

In order to pursue this matter further, you must file a lawsuit against the respondent(s) named in the charge **within 90 days of the date you receive this Notice**. Therefore, you should **keep a record of this date**. Once this 90-day period is over, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and its envelope, and tell him or her the date you received it. Furthermore, in order to avoid any question that you did not act in a timely manner, it is prudent that your suit be filed **within 90 days of the date this Notice was mailed to you** (as indicated where the Notice is signed) or the date of the postmark, if later.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. (Usually, the appropriate State court is the general civil trial court.) Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. Filing this Notice is not enough. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Courts often require that a copy of your charge must be attached to the complaint you file in court. If so, you should remove your birth date from the charge. Some courts will not accept your complaint where the charge includes a date of birth. Your suit may include any matter alleged in the charge or, to the extent permitted by court decisions, matters like or related to the matters alleged in the charge. Generally, suits are brought in the State where the alleged unlawful practice occurred, but in some cases can be brought where relevant employment records are kept, where the employment would have been, or where the respondent has its main office. If you have simple questions, you usually can get answers from the office of the clerk of the court where you are bringing suit, but do not expect that office to write your complaint or make legal strategy decisions for you.

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ATTORNEY REPRESENTATION -- Title VII, the ADA or GINA:

If you cannot afford or have been unable to obtain a lawyer to represent you, the U.S. District Court having jurisdiction in your case may, in limited circumstances, assist you in obtaining a lawyer. Requests for such assistance must be made to the U.S. District Court in the form and manner it requires (you should be prepared to explain in detail your efforts to retain an attorney). Requests should be made well before the end of the 90-day period mentioned above, because such requests do not relieve you of the requirement to bring suit within 90 days.

ATTORNEY REFERRAL AND EEOC ASSISTANCE -- All Statutes:

You may contact the EEOC representative shown on your Notice if you need help in finding a lawyer or if you have any questions about your legal rights, including advice on which U.S. District Court can hear your case. If you need to inspect or obtain a copy of information in EEOC's file on the charge, please request it promptly in writing and provide your charge number (as shown on your Notice). While EEOC destroys charge files after a certain time, all charge files are kept for at least 6 months after our last action on the case. Therefore, if you file suit and want to review the charge file, **please make your review request within 6 months of this Notice**. (Before filing suit, any request should be made within the next 90 days.)

IF YOU FILE SUIT, PLEASE SEND A COPY OF YOUR COURT COMPLAINT TO THIS OFFICE.

Online Access to Charge Information

U.S. Equal Employment Opportunity Commission <noreply@eeoc.gov>

Tue 12/24/2019 2:38 AM

To: Seth Carson <seth@dereksmithlaw.com>

1 attachments (186 KB)

eeoc_color_seal3008129252477331876eeoc_color_seal;



U.S. Equal Employment Opportunity Commission

Dear Lisa Barbounis:

This notice is being sent to you because you recently filed a charge (530-2020-01489) with the U.S. Equal Employment Opportunity Commission (EEOC). EEOC is pleased to inform you that you can now access information about your charge through a secure website, the [EEOC Public Portal](#).

EEOC's Public Portal allows you to:

- Update your contact info
- Upload a letter of representation from your attorney if you have one
- Upload documents supporting your charge
- Request the respondent's Position Statement if it submits one, and upload your response
- Check the status of your charge

To access your charge information online:

1. Go to <https://publicportal.eeoc.gov/portal/>
2. Select **My EEOC Cases**.
3. Click **Sign-Up Now** under **New Users**.
 - Enter your contact information and create a password.
 - When you create your account, you'll automatically log into the Portal.
4. Once you're logged-in, you'll be taken directly to your charge.

IMPORTANT! When entering your contact information, enter the Email Address that this notice was sent to.

Only you and the EEOC can access your charge information. If you have an attorney or other representative assisting you with your charge, your representative received a copy of this email. Only one of you may create an account for this charge. If you create an account, you will need to provide your log-in information to your attorney or representative to allow them to access your online charge information.

What You Should Do Next:

There are a few important things to keep in mind after filing a charge with EEOC, particularly:

LB EEOC Docs 0030

- You must keep your documents – both paper and electronic
- Look for a job and keep records of your job search if you are unemployed

Given the high demand for EEOC's services and the agency's limited resources, we ask you to be patient. EEOC's investigation will vary based on many factors, including the agency's responsibility to focus on matters that serve the broader public interest in equal opportunity. EEOC is committed to strong enforcement of the law and excellent service to the public. Your cooperation is essential to EEOC's investigation of your charge.

EEOC typically receives over 90,000 charges of discrimination from workers out of more than 500,000 inquiries seeking information and assistance every year. Although EEOC is able to address thousands of complaints, the agency cannot remedy every potential violation of the federal discrimination laws. Recognizing this, Congress gave workers the right to file lawsuits in court after first allowing EEOC the opportunity to investigate their charge.

If you want to file a lawsuit before the EEOC has finished our investigation, you can request a Notice of Right-to-Sue. Go to <https://www.eeoc.gov/employees/lawsuit.cfm> for more information. If you want the EEOC to continue investigating your charge, don't request a Notice of Right-to-Sue.

This email is an automated notification from the U.S. Equal Employment Opportunity Commission (EEOC) regarding charge 530-2020-01489. **Please do not reply to this email, as the email address is unattended.**

Notice of Confidentiality: The information contained in this transmission may contain privileged and confidential information, including information protected by federal and state privacy laws. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution, or duplication of this communication is strictly prohibited and may be unlawful. If you are not the intended recipient, please contact us at digital-support@eeoc.gov and destroy all copies of the original message and attachments.